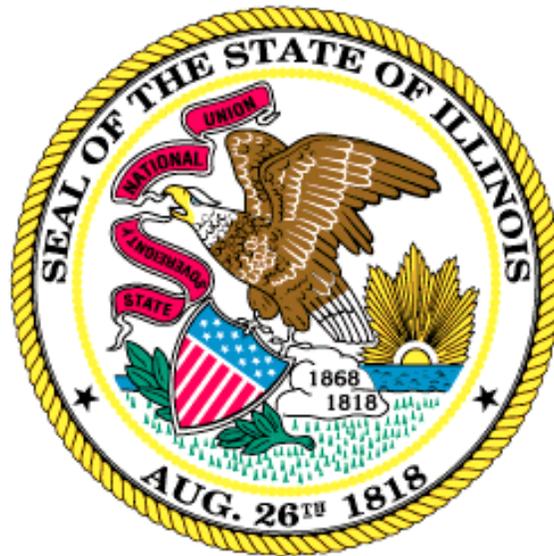


THE BILINGUAL NEEDS AND BILINGUAL PAY SURVEY REPORT FOR FISCAL YEAR 2019 July 1, 2018 – June 30, 2019



**In accordance with Personnel Code, the Director of the Department
of Central Management Services submits this report to the members
of the Illinois General Assembly**

January 1, 2020

**Janel L. Forde
Acting Director**



BILINGUAL NEEDS AND BILINGUAL PAY REPORT 2019

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EXECUTIVE SUMMARY

Illinois State Government must ensure all Illinois residents can fully participate in civic life and enjoy unrestricted access to the rights, privileges, and benefits to which they are entitled. Our State provides services that are often vital for health, welfare, safety, and quality of life. The greater our ability to serve Illinois residents, the more effective Illinois government will be.

The Department of Central Management Services (CMS) is required to develop a uniform procedure for assessing an agency's need for employees with appropriate bilingual capabilities. The 2019 Bilingual Needs and Bilingual Pay Report ("BNBP Report" or "Report") offers guidance for agencies to determine the demand they face for bilingual services along with their capacity to address that demand. The BNBP Report also provides suggestions for agencies to improve their ability to serve populations with Limited English Proficiency (LEP).

This BNBP Report should be read in conjunction with CMS' new user-friendly and interactive Bilingual Dashboard that consolidates agency-level and State-wide data from the past several years into an attractive and informative web-based tool. The dashboard makes it easier for the general public to examine State data, which empowers users and increases transparency and accountability in State government. The Bilingual Dashboard can be found here: <https://www2.illinois.gov/cms/personnel/DEP/Pages/BNBP.aspx>.

One key lesson from this Report is the need for State agencies to implement formal language tracking mechanisms for each of their public interactions. This action will provide a greater understanding of the demand for bilingual services, which will provide the necessary data to target improvements in our bilingual program.

Overall results for the survey indicate there is significant and growing need for bilingual services in Illinois. While the population with LEP is increasing, the number of State employees in bilingual positions has fallen by 14 percent since last year from 2,155 to 1,856. On average, each State employee participated in approximately 3,277 bilingual communications, which tended to be simple, quick (15 minutes or less) interactions. The Department of Children and Family Services, the Commerce Commission, and the Department of Revenue all reported that nearly all (76 percent to 100 percent) of their bilingual interactions were in-depth.

U.S. Census data for Illinois populations with LEP is used as a method of gauging whether bilingual employees are located in areas with high potential for language assistance requests. While the State as a whole is filling more bilingual positions than it is losing, the location of bilingual State employees should better correspond to U.S. Census LEP data.

In this 2019 BNBP Report, individual agencies are given tools to monitor themselves, make informed decisions, and craft targeted initiatives. Because the State's bilingual program is in its infancy, commencing in late 2017, and data quality needs to improve, there is not enough information to appreciate which agencies have the most successful bilingual programs.

Data quality improvement is anticipated as agencies routinize tracking mechanisms for bilingual interactions and CMS' new data practice assists in collection practices and analysis.

As our bilingual program becomes more sophisticated and agencies become more deliberate in their choices involving bilingual issues, CMS will be better positioned to showcase how following the State's BBNP procedures will strengthen agencies' ability to represent everyone in their service populations, including populations with LEP.

I. Introduction

State government's primary responsibility is to ensure that everyone in Illinois can access the services government provides. Critical government services such as police and fire emergency rescue, child protection, food assistance, health care, employment benefits, and other essential services must be accessible to everybody in Illinois or the agency fails to satisfy its fundamental mission. Governor JB Pritzker and the Department of Central Management Services (CMS) are committed to making State government more accessible, equitable, and representative of the people we serve.

Illinois is home to more than one million Limited English Proficiency (LEP)¹ residents, which constitutes nearly 10 percent of our population and the fifth largest concentration of individuals with LEP in the United States. Individuals with LEP have legal rights, privileges and benefits to which they are entitled, like their English-speaking counterparts. It is our goal to prevent language barriers from allowing everyone we serve to fully participate in civic life and fully access government services.

The Department of Central Management Services (CMS) is responsible for monitoring and reporting on the progress of State agencies' bilingual resources. The goal of the reporting is to ensure that language barriers are not limiting access to services for Illinois' significant and growing population with Limited English Proficiency. To achieve this goal, it is necessary for State agencies to be informed about the nature of their encounters with requests for language assistance. They also must be prepared to address those encounters with enough bilingual resources to overcome language barriers.

Language barriers for those with Limited English Proficiency pose challenges when trying to access information about available government services or an individual's legal rights or obligations.² Individuals with Limited English Proficiency are subject to societal exclusion and marginalization, which makes it vital for State government to take steps to bridge language barriers. The price of marginalization is not only borne by the individual with Limited English Proficiency, but the public safety, health, economic prosperity, and general welfare of all Illinois residents is furthered by increasing language access to State programs and services.³ Accordingly, bilingual employees are essential to ensure a fully representative, responsive, and effective State government. The strength of the State's bilingual program directly impacts the State's ability to serve the public.

The State's bilingual program is still in its infancy. This is only the third year that agencies have been given detailed, written recommendations for how to strengthen their internal bilingual programs. This is also the third-year agencies have received new questions on the bilingual survey seeking information they had not yet begun tracking.

¹ Persons with limited English proficiency are defined as individuals who do not speak English as their primary language, and who have a limited ability to read, write, speak, or understand English. [LEP.gov: Frequently Asked Questions](#).

² [Language Access to Government Services Task Force Act](#), 20 ILCS 5095/5(3).

³ *Id.*, at §5(5).

As the bilingual program evolves, agencies are expected to begin diligently and consistently tracking bilingual interactions. Likewise, CMS is planning to redesign our surveys to clarify ambiguity in questions and phrase questions in the most ideal way to collect the data we seek.

II. Legal Authority for BNPB Report

CMS is directed by the [Illinois Personnel Code](#)⁴ to oversee the State’s bilingual program by formulating strategies for language proficiency testing, requiring agencies to annually assess their bilingual programs, and filing annual reports to the General Assembly.

The Department shall formulate and administer recruitment plans and testing of potential employees for agencies having direct contact with significant numbers of non-English speaking or otherwise culturally distinct persons.⁵

The annual BNPB Report must include:

- A. Each agency’s needs assessment;
- B. Number of bilingual job postings;
- C. Number of bilingual positions filled;
- D. Number employees receiving bilingual pay;
- E. Number of employees receiving bilingual pay for languages other than signing or manual communication, and;
- F. Number of Hispanic/Latino and non-Hispanic/Latino employees who receive bilingual pay for languages other than signing or manual communication.

This 2019 Bilingual Needs and Bilingual Pay Report includes all statutorily required elements.

III. Data Collection and Presentation for 2019 BNPB Report

A. Data Collection

“The Department [of Central Management Services] shall require each State agency to annually assess the need for employees with appropriate bilingual capabilities to serve the significant numbers of non-English speaking or culturally distinct persons.”⁶

Pursuant to this legislative directive, CMS annually requires each State agency to complete a survey that solicits the data and information needed for the agency to assess the extent of its need for bilingual employees

The 2019 BNPB survey was sent to the 50 coded agencies, plus the Office of the Executive Inspector General (OEIG). CMS commends OEIG’s voluntary participation each year. Data was requested for fiscal year 2019, which began July 1, 2018 and ended June 30, 2019. No survey

⁴ [Illinois Personnel Code](#), 20 ILCS 415/9(6).

⁵ *Id.*

⁶ *Id.*

response was received by three coded agencies: Department of Insurance, Law Enforcement Training and Standards Board, and State Police Merit Board.

B. Data Presentation: Bilingual Dashboard

Last year, CMS transformed how we display and analyze our data. Instead of inserting two-dimensional charts into the annual BNPB Report, we synthesized agencies' current and previous survey responses and built an informative, visual and interactive Bilingual Dashboard which allows users to quickly access State-wide and agency-level data, examine yearly trends, and isolate agencies for focused review.

The Bilingual Dashboard increases the State's transparency, accountability, and motivation to rely on data to drive diversity strategies. The Bilingual Dashboard can be found at <https://www2.illinois.gov/cms/personnel/DEP/Pages/BNBP.aspx> and should be considered part of and examined in connection with this 2019 BNPB Report.

IV. CMS Required to Develop a Uniform Procedure for State Agencies

Currently, agencies act in relative isolation when it comes to their bilingual programs. Many programs are inconsistent in their procedures, which prompted agencies to seek guidance from CMS. The Personnel Code specifically requires CMS to develop a uniform procedure for assessing an agency's need for employees with appropriate bilingual capabilities.⁷

Over the years, CMS has consulted with stakeholders, including the Hispanic and Asian-American Employment Plan Advisory Councils, agency representatives, elected officials, advocacy organizations, and the general public, regarding bilingual communication by State government, all of which has generated excellent ideas.

In the 2017 BNPB Report, CMS laid out elements to include in a uniform procedure. In the 2018 BNPB Report, CMS provided a detailed uniform procedure for agencies to use to help them grow their bilingual programs. In this 2019 BNPB Report, we continue to develop a framework for the State's bilingual program with the goal of launching an aggressive information campaign to educate State agencies on the profound significance of accurately tracking bilingual interactions in real time and in all modes; e.g., in-person, telephone, email, website hits, etc.

This BNPB Report should be interpreted as a living document intended to evolve as the State's data collection and utilization improve. Combined with improvements to Diversity and Inclusion's data collection and analysis procedures, CMS expects to establish a robust bilingual program once these safeguards are in place.

V. CMS' Overall Policy Goals

Our goal is to eliminate LEP as a barrier to equal access to State services, programs, or activities. To accomplish this, language assistance must be effective and meaningful, the mode of language

⁷ [Illinois Personnel Code](#), 20 ILCS 415/9(6).

assistance should match the mode of the request for language assistance, and there should be no significant delay in the rendering of language assistance.

A. Deliver Effective, Meaningful and Timely Language Assistance

People with LEP are entitled to meaningful access to the State’s programs, resources, and services through language assistance that is accurate, timely, effective, and not significantly restricted, delayed, or inferior compared to that provided to individuals who do not require language assistance.

B. State Bears Responsibility for Ensuring Equal Access to Services

Individuals with LEP will avoid contact with the State if effective communication appears futile. Agencies are responsible for creating an environment in which individuals with Limited English Proficiency are aware of the availability of free bilingual services. Frontline bilingual and non-bilingual employees alike bear the burden of ensuring communications are not impaired due to a language barrier and should proactively strive to assist someone who has given reason to believe they need bilingual services.

Because it is the State’s responsibility to provide meaningful language access to its residents, to appreciate the scope of our responsibility we must begin by collecting accurate data regarding language assistance within State government.

1. Data Reliability

a. Agencies Must Improve Tracking Bilingual Interactions

Accurate data is dependent upon agencies tracking the languages of public interactions. As in years past, this is the State’s most important and most urgent need. During fiscal year 2019, 54 percent of agencies did not track any bilingual interactions. The agencies that do track often lack a complete data set because they do not track bilingual interactions as they occur. Twenty-four percent of the agencies track bilingual interactions retrospectively, either through the employee’s memory or through the employee’s supervisor’s estimation, which is likely less accurate.

We encourage all agencies to adopt a formal real-time language tracking mechanism to improve data accuracy. The more accurate our data, the more informed our policies will be.

b. CMS Must Continue to Improve Data Collection Mechanisms

The BNPB Survey questions were drafted years ago and have remained relatively the same over time. CMS' Data Practice will assist in the collection and analysis of surveys moving forward.

Due to the lack of tracking mechanisms and the fact that CMS modified many of the survey questions this year, certain data seem inaccurate. For example, many agencies’ data is significantly different than last year’s with no other obvious explanation.

C. Language Assistance Mode Matching

Ideally, the mode of the bilingual services should match the mode of contact initiated by the individual with LEP; e.g., in-person if the individual with LEP is in person, by phone if the individual with LEP is on the phone, etc. State agencies should first look to their bilingual staff to provide language assistance. If no one is available, then agencies should take advantage of the CMS language use master contract or other available professional resources and consider this unavailability when evaluating their bilingual programs.

Nearly half of the agencies (40 percent) reported that 76 percent to 100 percent of the time the mode of the language assistance matched the mode of the request for language assistance. However, the next largest group (33 percent) reported that language assistance mode matching “never” happens.

D. Proactive Approach

Agencies must be proactive about ensuring public awareness of the availability of free bilingual services to overcome the opposite presumption. To counteract individuals with LEP self-selecting out of our data pool on the false assumption that attempts at communication will be futile, agencies should proactively and widely publicize the availability of free bilingual services.

Agencies have the resources to reach the LEP population through their websites and written materials. To that end, agencies should translate the most important and most visited portions of their websites into the languages most commonly encountered along with the agency’s most important and most disseminated written materials.

1. Publicize the Availability of Free Bilingual Services

a. Translate Website

Translation of State resources is an area that needs improvement. Agencies frequently connect with their service populations through their websites and leverage the internet to communicate with a diversity of populations in their native languages. Last year, fewer than one quarter of agencies had translated their websites into languages other than English. This year, just under one-third of the agencies (31 percent) have translated their websites, mostly into Spanish.

Agencies should also translate their most important written materials and written communications to external stakeholders.

b. Post Notice of the Availability of Bilingual Services

Another way to publicize the availability of free bilingual services is by posting notices in each facility in conspicuous locations and in the languages most commonly encountered. Agencies were asked whether and where they post notices of the availability of free bilingual services, and if so, (a) whether notices were posted on the agency’s website, every public entrance to the

facility, or service desk of all frontline staff, or two or more of the above, and (b) whether notices were posted in languages other than English.

This year, 58 percent of agencies reported they do not post notices of the availability of free bilingual services, up from just under half last year. Of the agencies that do post notices, 33 percent are in English only, up sharply from 10 percent last year.

c. Conduct Outreach to Communities with Limited English Proficiency

Another opportunity to raise awareness of the State’s bilingual program is through outreach in different languages to community groups, advocacy organizations, and members of the business community who assist individuals with LEP. This outreach could be conducted in connection with employment outreach.

2. Offer On-Site Resources

Each facility that receives a substantial amount of bilingual interactions should have on-site bilingual resources that are immediately available to the public. These could consist of on-site suggestion forms, an on-site liaison to provide guidance and answer questions, or a method of contacting a help desk for language assistance.

E. Identify Missed Language Assistance Opportunities to Surmount

1. Track How Often Language Assistance Is Unavailable

To best evaluate the State’s effectiveness in serving the Limited English Proficiency population, we must know how often language assistance is requested but unavailable and how often language assistance is handled by a family member, friend, or member of the public as opposed to by the State. This information reveals gaps in the State’s effectiveness at serving the public with language assistance. Because it is the State’s responsibility to provide meaningful language access to its residents, we must be cognizant of all requests for language assistance, both obvious and subtle.

Accordingly, agencies need to track the number of times the State misses the opportunity to provide language assistance. Agencies should also track the number of times language assistance is handled by a family member, friend, or member of the public as opposed to by the State. Most agencies reported that never during fiscal year 2019 was there a request for language assistance that they could not handle or that was handled by someone not affiliated with the agency, such as a family member, friend, personal interpreter, or other member of the public.

F. Mitigate Assumption of Inability to Communicate

In addition to the LEP population that contacts an agency, we must consider the potential LEP population that would contact the agency absent perceived language barriers, some of which we

are not yet aware. Otherwise, we hinder our ability to accomplish our goal of equal and meaningful access to State government for all.

To counteract individuals with LEP self-selecting out of our data pool on the false assumption that attempts at communication will be futile, agencies should widely publicize the availability of free bilingual services and examine factors that could positively influence communication flow between State government and LEP populations.

G. Demonstrate Commitment Through Written Policies

Written policies educate staff how to perform desired tasks and signify their importance to the agency. To demonstrate agencies' commitment to effective and meaningful language assistance, agencies will need to begin or continue formulating and documenting practices previously performed on an ad hoc basis. CMS will support agencies' efforts to prepare written policies with a draft set of guidelines on which we will solicit agencies' feedback.

1. Adopt Written Policies Regarding Agencies' Bilingual Resources

State agencies must "annually assess the need for employees with appropriate bilingual capabilities to serve the significant numbers of non-English speaking or culturally distinct persons."⁸ Most State agencies generally do not follow a formal set of procedures when determining (a) whether employees have "appropriate" bilingual capabilities, or (b) the number of bilingual employees needed to provide effective public service. As the State's formal bilingual program evolves, agencies will need to have written policies with clear, objective factors to apply to the decision-making processes around various bilingual issues.

2. Adopt Written Policies to Determine Number of Bilingual Positions

Agencies are encouraged to develop written policies that guide decision-makers on how to determine the number of bilingual employees necessary to render effective public service to their agency's Limited English Proficiency population. Currently, the majority of agencies (88 percent) do not have such written policies. Without an idea of the number of bilingual employees necessary for effective public service, it is impossible for agency personnel to know on a case-by-case basis whether to add or delete the bilingual option when the agency prepares a job posting.

3. Adopt Written Policies for Language Proficiency

To ensure the State's bilingual employees have "sufficient linguistic ability to render effective public service,"⁹ agencies should develop official policies regarding how to determine language proficiency. Agencies that offer the same language proficiency evaluation of every job candidate will miss whether the position calls for verbal or written skills and the unique terms of art the candidate is likely to use as an employee. Currently, only 27 percent of agencies report having a written policy covering linguistic ability.

⁸ [Personnel Code](#), 20 ILCS 415/9(6).

⁹ [Personnel Code](#), 20 ILCS 415/9(6).

H. Deliver Consistently Outstanding Public Service State-wide

Our overall policy goal is to weave together a cohesive, strategic State-wide approach that ensures that all Illinois residents, regardless of which State agency they contact, receive outstanding public service and have the opportunity to be informed of, participate in, and benefit from public services, programs, and activities at a level equal to individuals able to communicate in English.

VI. CMS' Uniform Assessment Tool

To properly assess agencies' capacity to effectively serve individuals with Limited English Proficiency, first one must accurately capture the demand for bilingual services and then one must accurately evaluate the ability to effectively communicate through the agencies' bilingual resources.

A. Part I: Assessing Demand for Language Assistance

1. Nature of Bilingual Interactions received by State Agencies

Proceeding under the caveat that data reliability is currently a grave concern, survey results reflect that State agencies encountered a large volume of bilingual interactions last year that generally lasted 15 minutes or less and did not consume many resources.

Agencies were asked for the percent of time bilingual interactions were "in-depth," defined as:

- *More than a brief written translation (the transference of meaning from text-to-text, and more than speech translation for the purpose of facilitating dialogue).*
- *A commitment of extensive time and resources.*
- *The simultaneous or consecutive interpretation of complex concepts.*

All but three agencies reported providing in-depth assistance less than 50 percent of the time: Children and Family Services, Commerce Commission, and Department of Revenue, which all reported spending 76 percent to 100 percent of the time on in-depth bilingual interactions.

2. Incorporate U.S. Census LEP Data into Bilingual Plan

Reviewing U.S. Census data regarding the LEP populations surrounding State facilities offers a benchmark for assessing the agency's LEP service population, though not all the LEP individuals in those LEP populations will fall within an agency's service population.

The Illinois Department of Human Rights divides the State into 10 regions that agencies are familiar with due to the mandatory quarterly EEO/AA¹⁰ reports agencies file with Human Rights. The Bilingual Dashboard provides a side-by-side comparison by geographic region of the State's

¹⁰ EEO/AA stands for Equal Employment Opportunity/Affirmative Action.

LEP population and the location of bilingual State employees. We recommend that agencies explore Census LEP data to identify the languages most used by LEP populations in the various regions to best appreciate the potential LEP populations that could visit the facility if there were fewer barriers. Relevant Census data can easily be accessed on CMS' Bilingual Dashboard.

B. Part II: Assessing State's Capacity to Address Demand for Bilingual Services

1. Bilingual Employees

The number of State employees in bilingual positions has fallen since last year, from 2,155 to 1,856 or 14 percent. Each State employee in a bilingual position handled an average of approximately 3,277 bilingual interactions. Of the State employees in bilingual positions, 17 percent are fluent in signing or manual communication and four percent are fluent in reading Braille.

2. Compliance with State Services Assurance Act for FY2008¹¹

The State Services Assurance Act was enacted because:

The General Assembly finds that State government delivers a myriad of services that are necessary for the health, welfare, safety, and quality of life of all Illinois residents. Because State services are used by many Illinois citizens who cannot speak the English language fluently, there is a need for bilingual State employees. The number of workers in State government who speak a language other than English is inadequate, leaving those workers who do speak another language overworked and incapable of meeting the rising demand for their services.

In response to this crisis, it is the intent of the General Assembly in FY 2008 to ensure the hiring and retention of additional bilingual frontline staff in State agencies where public services are most used. These additions consider our State's current revenue crisis and are a first step. Raising bilingual staffing to meet higher national standards to fully ensure the effective delivery of essential services is the long-term goal of the General Assembly.¹²

The State Services Assurance Act sets staffing standards for frontline bilingual staff who are members of various AFSCME bargaining units within 10 State agencies. These agencies are required to increase and maintain the number of frontline bilingual staff over the levels they maintained on June 30, 2007 and the Act lists the number each agency is required to maintain.

It is difficult to determine compliance with the State Services Assurance Act from the bilingual survey question, which could have been better phrased to solicit more precise information. This is one of the issues CMS' newly formed Data Practice will address in 2020. Nevertheless, the data appear to reflect that the following agencies are not in compliance: Department of Juvenile

¹¹ [5 ILCS 382/1 et seq.](#)

¹² *Id.*, at §3-10.

Justice, Department of Natural Resources, Illinois Environmental Protection Agency, Illinois State Police, or Department of Veterans' Affairs.

3. CMS Master Contract

In addition to State bilingual employees, 50 percent of agencies supplemented their bilingual services with the telephonic language interpreter services available through CMS, up 43 percent from last year.¹³

Usage amounted to 822,432 minutes up from last year by 95,513, or 13 percent. One hundred two languages were requested, same as last year. By far (75 percent), the top requested language was Spanish, as noted below.

CMS Master Contract		
1	Spanish	74.53%
2	Arabic	3.87%
3	Polish	3.43%
4	Russian	2.45%
5	French	1.75%
6	Swahili	1.74%
7	Korean	1.19%
8	Cantonese	1.17%
9	Mandarin	1.16%
10	Vietnamese	0.86%
11	Burmese	0.85%
12	Hindi	0.51%

The remaining 86 languages were requested less than 0.5 percent of the time.

VII. Foundational Strategies

A. Create a Needs Assessment

Agencies have not historically conducted rigorous assessments to determine the number of bilingual employees necessary at each facility to provide effective services to clients who need to communicate in a language other than English. Half (49 percent) of agencies that reported bilingual interactions last year also acknowledged they do not conduct a bilingual staffing needs assessment. Of the 51 percent of agencies that reported having a bilingual staffing needs assessment, none reported a detailed assessment.

¹³ CMS Master Contract #19-416CMS-BOSS4-P-8618 with Multilingual Connections provides translation and interpreter services. The Department of Innovation and Technology (DoIT) Master Contract #CMT9213100 with Propio Language Services provides language interpretation services by way of three-way telephone conversation and video.

A formal bilingual staffing needs assessment is necessary to ensure relevant factors are considered when determining the number and location of bilingual positions each agency must have to ensure effective State government service to LEP populations.

We recommend that agencies develop a formal assessment to determine the number of bilingual employees needed, and the languages in which they are needed, at each facility to ensure effective government. One approach, used by at least one other state,¹⁴ is based on a simple formula to determine the number of bilingual staff in a particular language that is needed at each facility to address the bilingual population in that language. For example, if 20 percent of bilingual encounters with the public at that facility occur in Spanish, then 20 percent of the frontline staff at that facility should be bilingual in Spanish.

B. Ensure Bilingual Staff has Appropriate Language Capabilities

Illinois law requires agencies to ensure bilingual employees possess appropriate bilingual capabilities to serve the significant numbers of people with Limited English Proficiency. The BNPB Survey does not currently solicit data regarding language proficiency assessments, yet we intend to include this on future surveys.

Agencies should evaluate their language proficiency assessments to ensure they are sufficiently robust and (a) can identify fluency, (b) are closely related to the job duties for the position, and (c) include common industry terms.

C. Leverage Bilingual Dashboard to Bolster Bilingual Program

Year to year, agencies fluctuate on their number of bilingual employees and number of bilingual positions filled, vacated, vacant, posted, created, and dissolved. Agencies are encouraged to scrutinize these data points in the Bilingual Dashboard and begin to manipulate them more strategically.

D. Training for Staff

The BNPB surveys do not currently solicit information about training, but CMS intends to include this in future surveys. We recommend that agencies train employees whose duties impact the bilingual workforce (e.g., Diversity, Human Resources, Affirmative Action staff) on the State's bilingual program to increase engagement, awareness, and a sense of purpose.

VIII. Conclusion

Data reliability concerns prevent meaningful analysis of the agencies' survey responses, yet CMS has plans to overcome this obstacle by educating agencies on the importance of tracking bilingual interactions with the public and by developing stronger data practices. Nevertheless, agencies should study and implement the recommendations in this 2019 Bilingual Report to immediately enhance their service to populations with Limited English Proficiency.

¹⁴ See, [Dymally-Alatorre Bilingual Services Act, California Government Code Section 7290 et seq.](#)

IX. CMS Contact

Questions, suggestions, and constructive criticism are welcome. Please direct your comments to:

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